

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

JONATHAN RIVERA-PIEROLA,

*Plaintiff,*

v.

BOARD OF REGENTS FOR THE  
OKLAHOMA AGRICULTURAL AND  
MECHANICAL COLLEGES; STATE OF  
OKLAHOMA *ex rel.* OKLAHOMA  
STATE UNIVERSITY; and ST.  
MATTHEWS UNIVERSITY, INC.,

*Defendants.*

Civil Action No.: 5:21-cv-00616-PRW

**PLAINTIFF'S FINAL WITNESS LIST**

COMES NOW, Plaintiff, Jonathan Rivera-Pierola ("Plaintiff"), hereby offers the following list of witnesses to be used in the trial of this case:

**WITNESSES- EXPECTED TO BE CALLED**

<b>No.</b>	<b>Name/Address</b>	<b>Proposed Testimony</b>
1.	Jonathan Rivera-Pierola c/o Jason J. Bach The Bach Law Firm, LLC 7881 W. Charleston Blvd., Suite 165 Las Vegas, NV 89117 Tel: (702) 925-8787	Plaintiff can testify to the facts and underlying circumstances surrounding the arbitrary and discriminatory treatment he was subject to during his rotation with Defendants. Plaintiff can testify that he was subject to false accusations of lying and dishonestly and penalized in his grading without opportunity to defend himself by Defendants, and then, following a virtual rotation that Defendants failed to provide promised instructions for the scheduled length of time. Plaintiff can testify regarding his dismissal from OSU and ultimately from SMU as well.

2.	Dr. Paul Demars Clinical Associate Professor College of Veterinary Medicine Oklahoma State University 2065 West Farm Road Stillwater, OK 74078 Tel: (405) 744-7000	Dr. Demars can testify as to his role as a clinical associate professor in the field of Veterinary Clinical Sciences at OSU, his observations of Plaintiff during Plaintiff's clinical studies, his evaluations of Plaintiff during his rotations, specifically Plaintiff's Community Practice rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program
3.	Dr. Lara Sypniewski College of Veterinary Medicine Oklahoma State University Veterinary Teaching Hospital Tel: (405) 744-7305	Dr. Sypniewski can testify as to her role as a Clinical Associate Professor in the field of Veterinary Clinical Sciences at OSU, her observations of Plaintiff during Plaintiff's clinical studies, her evaluations of Plaintiff during his rotations, specifically Plaintiff's Community Practice rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
4.	Dr. Margi Gilmour Associate Dean of Academic Affairs (retired) College of Veterinary Medicine Oklahoma State University 208 N. McFarland Stillwater, OK 74078 Tel: (405) 744-6595	Dr. Gilmour can testify as to her role as the former Associate Dean of Academic Affairs Dean of the College of Veterinary Medicine at OSU at the time Plaintiff was attending OSU, her interactions and communications with Plaintiff and with faculty regarding Plaintiff's performance in the Program, and any decision(s) she made or about which she was consulted with regard to Plaintiff's status in the Program.
5.	Dr. Carlos Risco Dean of the College of Veterinary Medicine Oklahoma State University 200B McElroy Hall Stillwater, OK 74078 Tel: (405) 744-6651	Dr. Risco can testify as to his role as the Dean of the College of Veterinary medicine at OSU, his interactions and communications with Plaintiff and with faculty regarding Plaintiff, and any decision(s) he made with regard to Plaintiff's status in the Program.

6.	Dr. Stefano Di Concetto Anesthesiology Instructor (no longer employed at OSU) College of Veterinary Medicine Oklahoma State University	Dr. DiConcetto can testify as to his role as the instructor of record for the Anesthesiology rotation during the time Plaintiff was attending OSU, his observations of Plaintiff during Plaintiff's clinical studies, his evaluations of Plaintiff during his rotations, specifically Plaintiff's Anesthesiology rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
7.	Dr. Leslie A. Zebel Psychotherapist 7401 South Olive Avenue West Palm Beach, FL 33405 Tel: (561) 585-8787	Dr. Zebel, as Plaintiff's Psychotherapist can testify as to Plaintiff's physical and mental health during his attendance at OSU and after his dismissal from the program.
8.	Dr. Edward Zawadzki Psychiatrist Lighthouse Health Group 4600 Military Trail, Suite 103 Jupiter, FL 33458 Tel: (561) 249-7400	Dr. Zawadzki, as Plaintiff's Psychiatrist can testify as to Plaintiff's physical and mental health during his attendance at OSU and after his dismissal from the program.
9.	Daniel Burba, DVM, Dip. ACVS Oklahoma State Center for Veterinary Health Sciences Veterinary Clinical Sciences Dept VCS Stillwater, OK, 74078 Tel: (405) 744-8469	Dr. Burba can testify to his role as the Clinical Director for Oklahoma State Center for Veterinary Health Sciences at the time Plaintiff was attending OSU, his interactions and communications with Plaintiff and with faculty regarding Plaintiff's performance in the Program, and any decision(s) he made or about which he was consulted with regard to Plaintiff's status in the Program.
10.	Candace Thrasher Academic Affairs/Provost and Senior Vice President Oklahoma State University 101 Whitehurst Stillwater, OK 74078 Tel: (405) 744-8789	Ms. Thrasher can testify as the person most knowledgeable of OSU's Academic Integrity Policy.

**WITNESSES- MAY BE CALLED**

<b>No.</b>	<b>Name/Address</b>	<b>Proposed Testimony</b>
1.	Dr. Gaby Verburgh Hoffmann Associate Professor Small Animal Internal Medicine Massey University School of Veterinary Medicine Private Bag 11 222 Palmerston North, 4442, New Zealand	Dr. Hoffmann can testify to her knowledge of Plaintiff's performance and her recommendation letter addressed to Plaintiff.
2.	Dr. Kip Lemke Instructor for Anesthesiology Clinic Oklahoma State University College of Veterinary Medicine McElroy Hall 208 S. McFarland St. Stillwater, Oklahoma 74078 Tel: (405) 744-8755	Dr. Lemke can testify to her role as an instructor for the Anesthesiology rotation during the time Plaintiff was attending OSU, her observations of Plaintiff during Plaintiff's clinical studies, her evaluations of Plaintiff during his rotations, specifically Plaintiff's Anesthesiology rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
3.	Mayte Aleman-Carter Anesthesia Technician Oklahoma State University College of Veterinary Medicine Veterinary Teaching Hospital Stillwater, Oklahoma 74078	Ms. Aleman-Carter can testify to her role as an Anesthesia Technician during Plaintiff's virtual Anesthesiology rotation and any communications she had with Dr. Di Concetto or other faculty regarding Plaintiff
4.	Arantxa Lasa, RVT Anesthesia Technician Oklahoma State University College of Veterinary Medicine Veterinary Teaching Hospital Stillwater, Oklahoma 74078	Ms. Lasa can testify to her role as an Anesthesia Technician during Plaintiff's virtual Anesthesiology rotation and any communications she had with Dr. Di Concetto or other faculty regarding Plaintiff.
5.	Shalee Ready, RVT Anesthesia Technician Oklahoma State University College of Veterinary Medicine Veterinary Teaching Hospital Stillwater, Oklahoma 74078	Ms. Ready can testify as to her role as an Anesthesia Technician during Plaintiff's virtual Anesthesiology rotation and any communications she had with Dr. Di Concetto or other faculty regarding Plaintiff.

6.	Sue McKenzie, RVT Anesthesia Technician Oklahoma State University College of Veterinary Medicine Veterinary Teaching Hospital Stillwater, Oklahoma 74078	Ms. McKenzie can testify to her role as an Anesthesia Technician during Plaintiff's virtual Anesthesiology rotation and any communications she had with Dr. Di Concetto or other faculty regarding Plaintiff.
7.	Marie Hughes Admin Support for Anesthesiology Clinic Oklahoma State University College of Veterinary Medicine Veterinary Teaching Hospital Stillwater, Oklahoma 74078	Ms. Hughes can testify to her role as Administrative Support during Plaintiff's Anesthesiology rotation while he was attending OSU, her observations of Plaintiff during Plaintiff's clinical studies, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
8.	Andrew Manley, DVM Manley Animal Hospital 3812 SE Adams Road Bartlesville, OK 74006 Tel: (918) 333-7286	Dr. Manley was also a student of St. Matthews University School of Veterinary Medicine and clinical rotation student in Oklahoma State University CVM. He will describe his experience of clinical rotations at OSU as a SMUCVM affiliate student.
9.	Nikol Irizarry, DVM Address to be provided	Dr. Irizarry Larriuz can testify to her role as a veterinary intern at Oklahoma State University College of Veterinary Medicine during Plaintiff's rotation, her observations of Plaintiff during Plaintiff's clinical studies, her evaluations of Plaintiff during his rotations, specifically Plaintiff's Community Practice rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.

10.	Heather Yates Oklahoma State University College of Veterinary Medicine Veterinary Medical Teaching Hospital Vet Tech Supv I 2065 W. Farm Road Stillwater, OK 74078 Tel: (405) 744-7000	Ms. Yates can testify to her role as a veterinary technician at Oklahoma State University College of Veterinary Medicine, her observations of Plaintiff during Plaintiff's clinical studies, specifically Plaintiff's Community Practice rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
11.	Tiffany Twomey Oklahoma State University College of Veterinary Medicine Veterinary Medical Teaching Hospital Sr Vet Tech 2065 W. Farm Road Stillwater, OK 74078 Tel: (918) 855-2865	Ms. Twomey can testify to her role as a veterinary technician at Oklahoma State University College of Veterinary Medicine, her observations of Plaintiff during Plaintiff's clinical studies, specifically Plaintiff's Community Practice rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
12.	Pam Hazlip Veterinary Medical Teaching Hospital Admin Supp Spclt II Veterinary Teaching Hospital Stillwater, OK 74078 Tel: (405) 744-7000	Ms. Hazlip can testify to her role as administrative support at Oklahoma State University College of Veterinary Medicine, her observations of Plaintiff during Plaintiff's clinical studies, specifically Plaintiff's Community Practice rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
13.	Jonathan Marlow Catoosa Small Animal Hospital 1901 N. Hwy 66 Catoosa, OK 74015, Tel: (918) 266-4090	Mr. Marlow can testify that he was a male student of Oklahoma State University CVM and his personal knowledge of attending the Community Practice Rotation with Plaintiff.
14.	Dr. Erik Clary Oklahoma State University College of Veterinary Medicine Veterinary Teaching Hospital Stillwater, Oklahoma 74078	Dr. Clary can testify to his role as an instructor for the Small Animal Surgery rotation during the time Plaintiff was attending OSU, his observations of Plaintiff during Plaintiff's clinical studies, his evaluations of Plaintiff during his rotations, specifically Plaintiff's Small Animal Surgery rotation, and interactions

		and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program. Additionally, Dr. Clary will testify as to his role on the PSC, his recollection of the PSC's review of Plaintiff's performance in the Program, and the determination(s) reached by the PSC regarding Plaintiff.
15.	Dr. Danielle Dugat Boren Veterinary Medical Hospital 2065 W. Farm Road Stillwater, OK 74075 Tel: (405) 744-9529	Dr. Dugat can testify to her role as an instructor for the Small Animal Surgery rotation during the time Plaintiff was attending OSU, her observations of Plaintiff during Plaintiff's clinical studies, her evaluations of Plaintiff during his rotations, specifically Plaintiff's Small Animal Surgery rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
16.	(First Name Unknown) Gross Veterinary Intern	Dr. Gross can testify to his/her role as a veterinary intern at Oklahoma State University College of Veterinary Medicine during Plaintiff's rotation, his/her observations of Plaintiff during Plaintiff's clinical studies, his/her evaluations of Plaintiff during his rotations, specifically Plaintiff's Community Practice rotation, and interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.
17.	Dr. Reed Holyoak Professor Veterinary Clinical Sciences 1 BVMTH Stillwater, OK 74078 Tel: (405) 744-8475	Dr. Holyoak can testify as to his/her role as an advisor for plaintiff at Oklahoma State University College of Veterinary Medicine during Plaintiff's clinical rotations. This includes interactions and communications with Plaintiff and/or with other faculty and/or students regarding Plaintiff's performance in the Program.



18.	Records custodians necessary to authenticate any challenged records	
19.	All witnesses necessary for rebuttal testimony	
20.	Plaintiff reserves the right to amend her final witness and exhibit list to call additional witnesses not identified and which may become known or relevant after Plaintiff's deposition	
21.	Plaintiff reserves the right to amend its final witness and exhibit list to call additional witnesses not identified and which may become known or relevant after Defendant/Plaintiff's Witnesses depositions	
22.	Any additional witness identified as or determined (through the remainder of the discovery period) to be relevant and reliable regarding the claims and/or defenses	
23.	All witnesses identified by Defendants to which Plaintiff does not object	

DATED this 30th day of June, 2023.

Respectfully submitted,

**THE BACH LAW FIRM, LLC**

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*Attorneys for Plaintiff Jonathan Rivera-Pierola*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of June, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Clinton W. Pratt  
Gaylan Towle II  
Board of Regents for the Oklahoma  
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Attorneys for Defendants Board of Regents and  
the State of Oklahoma *ex rel.* Oklahoma State University

/s/ Jason J. Bach  
Jason J. Bach